



JIM STRICKLAND  
MAYOR

DIVISION OF PUBLIC WORKS

TENNESSEE

Via Certified Mail #7015 3010 00001 9974 8683 Return Receipt Requested

January 4, 2017

Joellyn Brazile  
Tennessee Department of Environment and Conservation (TDEC)  
Division of Water Resources  
Memphis Environmental Field Office  
8383 Wolf Lake Drive  
Bartlett, TN 38133

**Re: City of Memphis  
T.E. Maxson Wastewater Treatment Facility/NPDES Permit #TN0020729  
Response to Notice of Violation dated 12-2-2016**

Dear Ms. Brazile:

The City of Memphis received the above-referenced Notice of Violation (NOV) from the Tennessee Department of Environment and Conservation (TDEC) via email on 12-2-2016. The NOV was issued subsequent to a Compliance Evaluation Inspection (CEI) performed by TDEC on 10-19-2016. The CEI evaluation period covered May 2014 through September 2016. The NOV referenced 132 exceedences of the Mason Facility's NPDES permit limits during the evaluation period. The NOV required written response on or before 1-6-2017 indicating what corrective actions the City has undertaken or plans to undertake to eliminate future exceedences at the plant.

The exceedence, causes, and corrective actions are summarized below.

Exceedences	Cause	Corrective Action
105 exceedences in January-March 2016 caused by hydraulic overloading of the plant during to high Mississippi River stages	Breach in Nonconnah Interceptor at Cypress Creek	Breach has been repaired
14 exceedences in April 2015 due to non-reporting of influent/effluent parameters associated with nutrient removal	Plant Chemist on extended leave	Communication has been improved among laboratory staff
9 exceedences on a couple of occasions due to low dissolved oxygen levels in contact basin mixed-liquor	Changes in industrial loading	Communication with industrial user has been improved. Plant operators instructed to keep closer watch on dissolved oxygen levels.
4 exceedences due to hard to settle solids in secondary clarifiers	Seasonal turn-over of lagoons	Plant operators have been informed of impact of lagoons operations on effluent quality

Please feel free to contact us if you have any questions, need additional information.

Sincerely,



Don Hudgins  
Administrator, Wastewater Treatment Facilities

C: Robert Knecht  
Paul Patterson